Application No. 10/572,718

Paper Dated: August 30, 2011

In Reply to USPTO Correspondence of August 9, 2011

Attorney Docket No. 0388-060453

## **REMARKS**

The courtesy of a telephone interview with Examiner Jonathan C. Teixeira Moffat is acknowledged.

Claims 1, 7, and 8 have been amended to clarify composition of the target steam piping system such that the values Qi and Qo and therefore the rations set forth in the claims, namely, Kts, Kx, Kxx and Kxx' cannot be considered to be contemplated by the Fujiwara Publication '716. Claims 1, 7, and 8 have been amended to describe the target steam piping system as equipped with a steam trap and a steam-using device wherein steam is supplied to the steam-using device through the steam piping equipped with a steam trap. Support for this amendment is found in Fig. 1 and lines 13 to 20 on page 26 of the application. Note the sentence which reads: "At respective positions of the steam piping 3, there are mounted the steam traps 2 in connection with the piping and the steam-using apparatus 4." Note also in Fig. 1, traps are positioned either on steam piping or associated with steam using devices.

In the rejection of February 3, 2011, the Examiner rejected claims 1-4 and 6-9 under 35 U.S.C. § 103(a) as being unpatentable over Fujiwara Publication '716. Reconsideration is requested.

The claims in the above-captioned application are directed to a different method of determining the desirability of replacing steam traps based on very different considerations than taught or suggested in the Fujiwara Publication '716.

As described in this application, steam traps are in two categories: (1) steam traps provided on the steam piping and (2) steam traps associated with steam-using devices.

The steam traps on the steam piping are for discharging from the piping condensed water generated from steam condensed in the piping before reaching a steam-using device. For example, if the heat insulation on the steam piping is insufficient, a large amount of steam will be condensed in the piping. The steam traps associated with the steam-using devices discharge water generated during operation of the steam-using devices. For example, when a substance is heated by the steam in a steam-using device, the steam trap associated with the steam-using device discharges condensed water generated from the steam cooled by the substance being heated.

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All steam traps are ideally configured to discharge condensed water alone while

preventing discharge of steam. At any trap, if there is steam discharged as steam through the

trap due to failure or the like, such steam is discharged without being effectively used by the

steam-using devices. This is steam corresponding to steam loss which is measured by Fujiwara

Publication '716. Fujiwara Publication '716 teaches first determining the steam loss due to

malfunctioning of each individual steam trap and aggregating at paragraph [0014].

On the other hand, steam condensed and discharged in steam traps associated with

the piping before reaching the steam-using devices is a steam loss (due to condensation and not

malfunction of the traps) that is not measured by Fujiwara Publication '716. Applicant's total

unknown steam amount Qx (Qx = Qi - Qo) is not the same as the aggregated loss due to trap

malfunction. It includes, in addition to the losses due to malfunctioning traps, losses such as

condensation in the piping before reaching the steam-using devices.

In the claims, Qi represents the total amount of steam supplied to the entire

evaluation target piping system. The numbers of steam-using devices to which steam is supplied

through the evaluation steam piping may be singular or plural.

In the claims, Oo represents the total necessary steam amount which is a total

amount of steam required by the steam-using devices. In other words, Qo is the amount of steam

consumed purely for the purposes of the steam-using devices. It does not include steam losses

due to the non-ideas functioning or malfunction of the steam traps associated with the steam-

using devices.

The unknown steam amount Qx includes trap losses as well as condensation

losses and leakage. There is no suggestion in the Fujiwara Publication '716 to use Qx in

evaluating the effectiveness of predetermined system improvements. It does not matter that Qi

and Qo, though not determined, are inherent in the Fujiwara Publication '716. There is no

suggestion or teaching in the Fujiwara Publication '716 to determine and use the quantities Qi,

Qo, and Qx to obtain a "ratio of reduction in steam loss."

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In view of the foregoing remarks and amendments, it is urged that this application is now in condition for allowance.

Respectfully submitted,

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